

March 28, 2019

**BY ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

*Re: Partial Pro Forma Assignment of Cable Landing License for the Honotua Submarine Cable System, FCC File No. SCL-LIC-20081008-00017 and SCL-MOD-20180410-00007*

Dear Ms. Dortch:

Pursuant to 47 U.S.C. § 34, Executive Order No. 10,530, and 47 C.F.R. § 1.767(g)(7), ONATI SAS (“ONATI”) (FRN 0028355444), hereby notifies the Commission of the partial *pro forma* assignment of the cable landing license for the Honotua submarine cable system connecting French Polynesia and Hawaii, from Office des postes et télécommunications de Polynésie française (“OPT”) (FRN 0015464282) to ONATI. This partial *pro forma* assignment results from a corporate reorganization of OPT. OPT and ONATI will therefore be joint cable landing licensees for the Honotua submarine cable system (and for the associated international Section 214 authorization, the subject of a partial *pro forma* assignment notification filed in parallel with this notification).

As authorized by recent changes in French Polynesia law, OPT has undertaken a restructuring of its operations to create new French Polynesia operating subsidiaries for its telecommunications, postal, and financial services businesses that will leave OPT itself operating as a holding company. By deed dated December 31, 2018, OPT agreed to delegate to ONATI the provision of telecommunications services in French Polynesia through the operation and use of network infrastructure owned by OPT (including the physical assets of the Honotua submarine cable system, to which OPT will retain legal title). Under the delegation, OPT will also transfer to ONATI the personnel of OPT’s telecommunications business. The delegation has been implemented on a phased basis, with delegation of authority with respect to the Honotua submarine cable system effective as of March 1, 2019.

ONATI is a simplified joint stock company organized under French Polynesia law and headquartered in Papeete, Tahiti, French Polynesia. OPT holds 100 percent of ONATI’s economic and voting interests. OPT, in turn, is wholly owned by the Government of French Polynesia, and its ownership has not changed since the initial licensing of the Honotua submarine cable system in 2010.

Ms. Marlene H. Dortch  
Federal Communications Commission  
March 28, 2019  
Page 2 of 2

ONATI's contact information is as follows:

Tehina Thuret  
Executive Manager  
Telecoms & Multimedia Business Unit  
ONATI SAS  
Rond-point de la base marine, Fare Ute  
BP 440  
98713 Papeete, Tahiti  
French Polynesia  
+689 41 74 65

Correspondence concerning this filing should be sent to Mr. Thuret at the address listed above, with a copy to:

Kent Bressie  
Harris, Wiltshire & Grannis LLP  
1919 M Street, N.W., Suite 800  
Washington, D.C. 20036  
+1 202 730 1337  
kbressie@hwglaw.com

As required by 47 C.F.R. § 1.767(g)(7), ONATI certifies in the attached certification that this partial assignment is *pro forma* in nature (as defined in 47 C.F.R. § 63.24(f)(2)(ii)) and would not, when considered together with all previous *pro forma* transactions, result in a change in control of the Honotua submarine cable system.

\* \* \* \* \*

ONATI has notified the Team Telecom agencies of this partial *pro forma* assignment.

Yours sincerely,



Kent Bressie  
Susannah Larson

*Counsel to ONATI SAS*

Attachment


## CERTIFICATION

I, Tehina Thuret, as Telecoms & Multimedia Business Unit Executive Manager of ONATI SAS, hereby certify as follows:

1. I have reviewed the attached partial *pro forma* assignment notification and believe that it states fully and accurately the circumstances of the partial *pro forma* assignment of the cable landing license for the Honotua submarine cable system.
2. This partial assignment described therein is *pro forma* in nature under the Commission's rules and, together with all previous pro forma transactions, would not result in a change in the ultimate control of the cable landing license for the Honotua submarine cable system.
3. No party to this notification is subject to a denial of federal benefits, including FCC benefits, under Section 5301 of the Anti-Drug Abuse Act of 1988.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Tehina Thuret



Executed March 27<sup>th</sup>, 2019